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17 **UNITED STATES DISTRICT COURT**
18
19 **DISTRICT OF NEVADA**

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21 KATHRYN MAYORGA,
22 Plaintiff,
23
24 vs.
25 CRISTIANO RONALDO,
26 Defendant.

27 Case No. 2:19-cv-00168-JAD-DJA

28 ECF No. 181

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18 **STIPULATION TO EXTEND THE TIME FOR PLAINTIFF AND**
19 **DEFENDANT'S RESPONSES TO THE NOTICE REGARDING REAL PARTY IN**
20 **INTEREST'S, LAS VEGAS METROPOLITAN POLICE DEPARTMENT, CRIMINAL**
21 **INVESTIGATIVE FILE [ECF 172] AND THE NEW YORK TIMES COMPANY'S**
22 **MOTION TO INTERVENE [ECF 176] (SECOND REQUEST)**

23 IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN Plaintiff
24 KATHERINE MAYORGA by and through her attorney LESLIE MARK STOVALL, ESQ. and
25 Defendant, CRISTIANO RONALDO, by and through his attorney PETER S. CHRISTIANSEN,
26 ESQ., that the time for Plaintiff and Defendant's responses to the Notice Regarding Real Party In
27 Interest's Las Vegas Metropolitan Police Department, criminal investigative file [ECF 172]
28 currently due on January 18, 2022 be extended to January 25, 2022; and further that responses to
The New York Times Company's Motion to Intervene [ECF 176], currently due on January 19,
2022, also be extended to January 25, 2022.



1 Plaintiff's counsel initially requested a one-week extension of time for Plaintiff to file
2 the foregoing responses. Defendant did not object and requested a reciprocal extension of time.
3 Plaintiff's counsel was unable to complete drafting the subject responses on or before January 11,
4 2022, and January 12, 2022, respectively, because Plaintiff's counsel and his family tested
5 positive and suffered the Covid-19 virus over the holidays which prevented Plaintiff from
6 reviewing and completing plaintiff's response to the notice regarding real party in interest, Las
7 Vegas Metropolitan Police Department, criminal investigative file [ECF 172] as well as
8 responding to the New York Times Company's Motion to Intervene [ECF 176].

9 Defendant's Counsel also had to dedicate substantial time to preparation for trial in other
10 cases and has experienced staffing shortages associated with the recent uptick in COVID-19
11 cases. Accordingly, Defense Counsel likewise asserted good cause for the first one-week
12 extension of the response deadlines.

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1 Since the time this Court granted the parties first request for extension [ECF 179] making
2 the foregoing responses due on January 18 and January 19, 2022, respectively, the Parties have
3 been diligently working on their responses. However, Defendant's Counsel recently initiated
4 negotiations in an attempt to resolve and/or further narrow the issues raised in the aforementioned
5 briefs and responses. Good cause exists to extend the instant deadline for one additional week,
6 in order to allow the Parties a more meaningful opportunity to exchange draft stipulations to
7 explore such a resolution and accordingly, the Parties stipulate to the same.

8 Respectfully Submitted this 18th day of January, 2022.

9 CHRISTIANSEN TRIAL LAWYERS

STOVALL & ASSOCIATES

11 /s/ Kendelee L. Works, Esq.

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ORDER

2 **IT IS HEREBY ORDERED** that Plaintiff and Defendant's responses to the notice
3 regarding real party in interest's, Las Vegas Metropolitan Police Department, criminal
4 investigative file [ECF 172] currently due on January 18, 2022, be extended to January 25, 2022;
5 and further that the parties' responses to The New York Times Company's Motion to Intervene
6 [ECF 176], currently due on January 19, 2022, be extended to January 25, 2022.

U.S. District Judge Jennifer A. Dorsey
January 24, 2022, *nunc pro tunc* to January 18, 2022

